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Counsel to Official Committee of Unsecured
Creditors

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON

In re

SeaPort Airlines, Inc.

Debtor.

Case No. 16-30406-tmb11

LIMITED OBJECTION TO DEBTOR'S
APPLICATION FOR AUTHORITY TO
EMPLOY PROFESSIONAL Special Counsel
- Barran Liebman LLP (Nelson D. Atkin, II)

The Official Committee of Unsecured Creditors (the "Committee") for its limited
objection to the Application for Authority to Employ Professional, Special Counsel - Barran
Liebman LLP (Nelson D. Atkin, II) (the "Application") (ECF No. 216) filed by SeaPort Airlines,
Inc. ("SeaPort" or the "Debtor") states as follows:

LIMITED OBJECTION

1. The Debtor seeks to employ Barran Liebman LLP to serve as special counsel to
advise the Debtor on employment issues, including the possible defense of an OSHA complaint
filed by Robert McKinney, the Debtor's former president.

2. The Committee understands and appreciates the complex nature of the industry in
which the Debtor operates. The Committee does not seek to substitute its judgment for that of
the Debtor on the topic of retention of professionals. Nor does the Committee question the

1 qualifications of the Barran Liebman firm to handle the employment matter identified by the
2 Debtor or the rates proposed to be charged.

3 3. The Committee has two essential concerns. First, it appears that the McKinney
4 complaint was filed in violation of the automatic stay. Prior to the retention of special counsel to
5 appear and defend on the merits, the Committee urges the Debtor to consider raising the
6 automatic stay in an attempt to have the complaint either dismissed or transferred to this Court.

7 4. Second, the Committee notes that in this relatively small case, the Debtor has
8 retained or is seeking to retain eight separate sets of professionals, not including counsel to the
9 Committee. Counsel for the Committee has discussed the need for each professional as the
10 applications have been filed. While legitimate needs have been articulated by the Debtor, the
11 Committee is concerned about the administrative burden such a large fleet of professionals
12 potentially places on this case and, in particular, on the Debtor's ability to successfully
13 restructure while making meaningful payments to its creditors.

14 5. Prior to the approval of any further estate professionals, the Committee requests
15 that the Court require the Debtor to fully report on the administrative expenses incurred to date
16 by the estate's professionals and provide budgeted amounts for each.

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1 6. In light of the rapidly approaching termination of exclusivity, the Committee is
2 anxious to engage in discussions with the Debtor regarding the outline of a plan of
3 reorganization.

4 Respectfully submitted.

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7 DATED: April 15, 2016

PERKINS COIE LLP

By: /s/ Douglas R. Pahl

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1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies that on the date shown below the foregoing **LIMITED**
3 **OBJECTION TO DEBTOR'S APPLICATION FOR AUTHORITY TO EMPLOY**
4 **PROFESSIONAL Special Counsel - Barran Liebman LLP (Nelson D. Atkin, II)** was electronically
5 filed with the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic
6 Filing to all CM/ECF participants, which includes Debtor's counsel, the United States Trustee's
7 office and parties requesting notice electronically, and a copy of the pleading will be sent via
8 U.S. Mail on the date shown below to the following parties:
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11 Franklin C. Adams POB 1028 Riverside, CA 92502-1028 12 <i>Creditor San Diego County Regional Airport Authority</i>	Michael J. Edelman 1633 Broadway 47th Floor New York, NY 10019 13 <i>Creditor Aircraft Lease Finance III</i>
14 Tulare County Tax Collector Attn Jorge Garcia Depty Tax Collector 221 S Mooney Blvd Rm 104-E Visalia, CA 93291-4593	15 Mark J. Wolfson 100 N Tampa St #2700 Tampa, FL 33602 <i>Interested Party Airlines Reporting Corp.</i>

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17 DATED this 15th of April, 2016

18 PERKINS COIE LLP

19 /s/ Douglas R. Pahl
20 Douglas R. Pahl, OSB No. 950476

21 Counsel to Official Committee of Unsecured
22 Creditors
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